

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE:**

**THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO, as representative of**

**COMMONWEALTH OF PUERTO  
RICO.<sup>1</sup>**

**Debtor**

**CASE NO.: 17-03283 (LTS)**

**TITLE III; PUERTO RICO  
OVERSIGHT, MANGEMENT AND  
ECONOMIC STABILITY ACT  
(PROMESA)**

**MOTION TO INFORM APPEARANCE OF CANTOR-KATZ COLLATERAL  
MONITOR LLC AT AUGUST 8, 2022 PRETRIAL CONFERENCE**

**TO THE HONORABLE COURT:**

**COME NOW** Cantor-Katz Collateral Monitor LLC, a Delaware limited liability company which serves as the collateral monitor for Wilmington Trust, N.A. in connection with the new bonds issued by the GDB Debt Recovery Authority (the “DRA”) pursuant to the *Government Development Bank for Puerto Rico Debt Restructuring Act*, Act No. 109-2017, as amended by Act No. 147-2018 and the approved Qualifying Modification for the Government Development Bank for Puerto Rico<sup>2</sup> under Title VI of the *Puerto Rico Oversight, Management and Economic Stability Act* (the “Collateral Monitor”), by and through the undersigned legal counsel, hereby submits this

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) and (vi) Puerto Rico Building Authority (“PBA”) Bankruptcy Case No.: 19-BK-5523 (LTS) (Last Four Digits of Federal Tax ID: 3801).

<sup>2</sup> See Dkt. No. 270 of Civil Case No. 18-01561 (LTS).

motion to inform (the “Informative Motion”) pursuant to this Honorable Court’s *Order Regarding Procedures For August 8, 2022, Pretrial Conference* [Dkt. No. 21493] (the “Procedures Order”),<sup>3</sup> and respectfully states as follows:

1. Two or fewer of Douglas S. Mintz, Peter J. Amend and/or Kelly V. Knight of Schulte Roth & Zabel LLP will appear on behalf of the Collateral Monitor at the pretrial conference on August 8, 2022 (the “Hearing”), which will be conducted via Zoom in accordance with the Procedures Order. As required by the Procedures Order, a Party Appearance Sheet is annexed hereto as Exhibit A.

2. Carmen D. Conde Torres, Esq. and Luisa S. Valle Castro, Esq. of C. Conde & Assoc., as local counsel for the Collateral Monitor, may attend the Hearing through the listen-in access lines provided by the Court.

3. Furthermore, the Collateral Monitor reserves the right to be heard and present oral argument to address any matter identified in the agenda to be filed by the Oversight Board in connection with the Hearing, or raised by any party at the Hearing related to the Title III cases or any adversary proceeding which may affect the interests of the DRA. The Collateral Monitor reserves the right to amend this Informative Motion as needed.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 22nd day of July, 2022.

**WE HEREBY CERTIFY** that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the

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<sup>3</sup> Capitalized terms used herein and otherwise not defined shall have the meaning ascribed to such term in the Procedures Order.

parties appearing in said system including the US Trustee and to all those parties registered to receive notice within the electronic notification service.

**C. CONDE & ASSOC. LAW OFFICES**

By: /s/ Carmen D. Conde Torres  
Carmen D. Conde Torres  
(USDC No. 207312)

By: Luisa S. Valle Castro  
Luisa S. Valle Castro  
USDC No.: 215611

254 San José Street  
Suite 5  
San Juan, PR 00901-1523  
Tel. 787-729-2900  
Fax. 787-729-2203  
E-Mail: [condecarmen@condelaw.com](mailto:condecarmen@condelaw.com)

-and-

**SCHULTE ROTH & ZABEL LLP**

By: /s/ Douglas S. Mintz  
Douglas S. Mintz (admitted *pro hac vice*)  
901 15th Street, N.W., Suite 800  
Washington, D.C. 20005  
Telephone: (202) 729-7470  
Facsimile: (202) 730-4520  
E-mail: [douglas.mintz@srz.com](mailto:douglas.mintz@srz.com)

and

Douglas Koff (admitted *pro hac vice*)  
Taleah E. Jennings (admitted *pro hac vice*)  
Abbey Walsh (admitted *pro hac vice*)  
Peter Amend (admitted *pro hac vice*)  
Kelly V. Knight (*pro hac vice* pending)  
919 Third Avenue  
New York, N.Y. 10022  
Telephone: (212) 756-2000  
E-mail: [douglas.koff@srz.com](mailto:douglas.koff@srz.com)  
[taleah.jennings@srz.com](mailto:taleah.jennings@srz.com)

[abbey.walsh@srz.com](mailto:abbey.walsh@srz.com)

[peter.amend@srz.com](mailto:peter.amend@srz.com)

[kelly.knight@srz.com](mailto:kelly.knight@srz.com)

***Attorneys for Cantor-Katz Collateral Monitor LLC, as  
Collateral Monitor for GDB Debt Recovery Authority***

**Exhibit A**

**Party Appearance Sheet**

Name of Party	Cantor-Katz Collateral Monitor LLC
Party Name Abbreviation (For Use with Zoom)	Cantor-Katz
Attorney(s) Representing Party (provide the listed information for each attorney who may appear for the Party): <ul style="list-style-type: none"><li>• Name,</li><li>• Email,</li><li>• Law Firm,</li><li>• Phone Number and</li><li>• Docket Entry No. for the Attorney's Notice of Appearance</li></ul>	Douglas S. Mintz douglas.mintz@srz.com Schulte Roth & Zabel LLP (212) 756-2000 [Dkt. No. 6976]  -and-  Peter J. Amend peter.amend@srz.com Schulte Roth & Zabel LLP (212) 756-2000 [Dkt. No. 6976]  -and-  Kelly V. Knight <sup>4</sup> kelly.knight@srz.com Schulte Roth & Zabel LLP (212) 756-2466 [Dkt. No. 19532]
Plan Objection Docket Entry No.	N/A
Witness List Docket Entry No.	N/A
Exhibit List Docket Entry No.	N/A
Other Statement Docket Entry No.	N/A
If a Party files a supplemental Party Appearance Sheet, the Party must include the Docket Entry No. of the original appearance sheet in the new filing which must be clearly marked as a "Supplemental" Party Appearance Sheet.	

<sup>4</sup> No more than two of the three attorneys listed will appear on behalf of the Collateral Monitor in the Zoom session at any given time pursuant to the Procedures Order ¶ 1.

<p><b>Note:</b> Pursuant to the Procedures Order ¶ 1, the Financial Oversight and Management Board for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority shall each be limited to 4 attorneys appearing in the Zoom session at any given time, and each other party-in-interest shall be limited to 2 attorneys at any given time. Parties-in-interest not appearing by counsel must have filed a written objection on behalf of him or herself and/or a statement of support in relation to plan confirmation consistent with either the (1) Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith, and/or (2) the Confirmation Hearing Procedures Order.</p>	
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